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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	Case No. 2:11-cr-00347-KJD-VCF
	)	
Plaintiff,	)	<b>STIPULATION TO CONTINUE</b>
vs.	)	<b>BRIEFING DEADLINES</b>
	)	<b>(ECF Nos. 799)</b>
DAVID A. LITWIN	)	
	)	<b>(Second Request)</b>
Defendant.	)	
	)	

The undersigned parties respectfully submit the following Stipulation for the Court's consideration.

**IT IS HEREBY STIPULATED AND AGREED**, by and between undersigned counsel for the government and undersigned counsel for the defendant, David A. LITWIN, that the deadline for the government's response to Defendant's Motion to Dismiss Indictment and Alternatively for Production of Grand Jury Instructions, currently set for June 16, 2023, be continued to **June 30, 2023**.

This Stipulation is entered into for the following reasons:

1. The Defendant has been extended a plea offer which, if accepted, would obviate the need for further litigation. The Defendant must accept or reject the offer by June 23, 2023, after which time the offer will be withdrawn.

2. Given the pending offer, the parties request that Government's response deadline be continued to allow the Defendant sufficient time to review and decide whether to accept the offer and allow the Government sufficient time to prepare its responses in the event that the Defendant declines to accept the offer.

**WHEREFORE**, the parties respectfully request that the Court accept the parties' Stipulation and enter an Order extending the time for the filing of the Government's Response to **June 30, 2023** and allowing the Defendant to file his reply on **July 7, 2023**.

**DATED** this 15th day of June, 2023.

Respectfully submitted,

JASON FRIERSON  
United States Attorney

*/s/ Nadia Ahmed*


NADIA AHMED  
Assistant United States Attorneys

*Attorneys for the United States*

*/s/ Lisa Rasmussen*

LISA RASMUSSEN  
Counsel for David LITWIN

**IT IS SO ORDERED** this 16th day of June, 2023.

  
KENT J. DAWSON  
UNITED STATES DISTRICT JUDGE